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USDC - BALTIMORE  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

DELROY JAMES SCOTT,

Defendant.

CRIMINAL NO.

ELH - 23-0179  
(Sexual Exploitation of a Child,  
18 U.S.C. § 2251(a) and (e); Coercion  
and Enticement, 18 U.S.C. § 2422(b)  
and 2427; Possession of Child Pornography,  
18 U.S.C. § 2252(a)(4)(B); Forfeiture, 18  
U.S.C. §§ 2253 and 2428, 21 U.S.C.  
§ 853(p) and 28 U.S.C. § 2461(c))

INDICTMENT

COUNT ONE

(Coercion and Enticement of a Minor)

The Grand Jury for the District of Maryland charges that:

From in or about November 2021 through in or about March 2022, in the District of Maryland, the defendant,

**DELROY JAMES SCOTT,**

did use a facility and means of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce Minor Victim #1, an individual who had not attained the age of eighteen (18) years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Maryland Criminal Law § 3-307, sexual offense in the third degree.

18 U.S.C. § 2422(b)

**COUNT TWO**

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

On or about November 9, 2021, in the District of Maryland, the defendant,

**DELROY JAMES SCOTT,**

knowingly attempted to and did employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, a series of nine (9) images and two (2) videos which depict Minor Victim #2, a minor female, naked from the waist down, some of which depict Minor Victim #2's exposed anus and genitalia, said image and video files having been stored on an iPhone XR, Model: A1984, S/N: DX3ZNDDCKXKP, manufactured in China.

18 U.S.C. § 2251(a)

18 U.S.C. § 2

**COUNT THREE**

(Coercion and Enticement of a Minor)

The Grand Jury for the District of Maryland further charges that:

From on or about November 4, 2021 through on or about November 10, 2021, in the District of Maryland, the defendant,

**DELROY JAMES SCOTT,**

did use a facility and means of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce Minor Victim #2, an individual had not attained the age of eighteen (18) years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Sexual Exploitation of a Child, as set forth in Count Two of this Indictment and Maryland Criminal Law § 3-307, sexual offense in the third degree.

18 U.S.C. § 2422(b)

**COUNT FOUR**

(Attempted Coercion and Enticement of a Minor)

The Grand Jury for the District of Maryland further charges that:

From in or about December 2021 through on or about February 27, 2022, in the District of Maryland, the defendant,

**DELROY JAMES SCOTT,**

did use a facility and means of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce Minor Victim #3, an individual had not attained the age of eighteen (18) years, to engage in sexual activity for which any person can be charged with a criminal offense, namely, Maryland Criminal Law § 3-307, sexual offense in the third degree.

18 U.S.C. § 2422(b)

**COUNT FIVE**

(Coercion and Enticement of a Minor)

The Grand Jury for the District of Maryland further charges that:

From on or about March 26, 2022 through on or about March 29, 2022, in the District of Maryland, the defendant,

**DELROY JAMES SCOTT,**

did use a facility and means of interstate and foreign commerce to knowingly attempt to persuade, induce, entice, and coerce Minor Victim #4, an individual had not attained the age of eighteen (18) years, to engage in sexual activity for which any person can be charged with a criminal offense, Maryland Criminal Law § 3-307, sexual offense in the third degree.

18 U.S.C. § 2422(b)

**COUNT SIX**

(Sexual Exploitation of a Child)

The Grand Jury for the District of Maryland further charges that:

On or about May 8, 2022, in the District of Maryland, the defendant,

**DELROY JAMES SCOTT,**

did knowingly employ, use, persuade, induce, entice and coerce a minor female to engage in sexually explicit conduct as defined in Title 18, United States Code, Section 2256(2), for the purpose of producing visual depictions of such conduct, and said visual depictions were produced using materials that were mailed, shipped, and transported in interstate and foreign commerce by any means, including by computer, that is, a video and images some of which depict Minor Victim #5, a minor female, bent over, with her dress lifted, and her genitals exposed, said image and video files having been stored on an iPhone XR, Model: A1984, S/N: DX3ZNDDCKXKP, manufactured in China.

18 U.S.C. § 2251(a)

18 U.S.C. § 2

**COUNT SEVEN**

(Possession of Child Pornography)

The Grand Jury for the District of Maryland further alleges that:

On or about May 11, 2022, in the District of Maryland, the defendant,

**DELROY JAMES SCOTT,**

did knowingly possess and knowingly access with intent to view any material that contained an image of child pornography, as defined in Title 18 United States Code, Section 2256(8)(A), that had been mailed, shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, that is, the defendant possessed a Apple iPhone XR cellular phone, S/N: DX3ZNDDCKXKP, manufactured in China, and a homemade black tower #J21012513002 containing 960GB Kingston SAA hard drive, S/N: 50026B768381B312, manufactured in Taiwan, which contained one or more visual depictions of prepubescent minors engaged in sexually explicit conduct.

18 U.S.C. §§ 2252A(a)(5)(B) & 2256  
18 U.S.C. § 2



**FORFEITURE ALLEGATION**

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Fed. R. of Crim. P. 32.2, notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. §§ 2253 and 2428, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461(c) as a result of the defendant's conviction under any of the offenses set forth in Counts One through Seven of this Indictment.

**Coercion and Enticement Forfeiture**

2. Upon conviction of any of the offenses in Counts One, Three through Five, of this Indictment, the defendant,

**DELROY JAMES SCOTT,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 2428(a):

a. any interest in any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violation; and

b. any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of such violation.

**Child Pornography Forfeiture**

3. Upon conviction of any of the offenses in Counts Two, Six or Seven of this Indictment, the defendant,

**DELROY JAMES SCOTT,**

shall forfeit to the United States, pursuant to 18 U.S.C. § 2253(a):

a. any visual depiction described in Title 18, United States Code, Sections 2251, 2251A, 2252, or 2252A, 2252B, or 2260 or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, received or possessed in violation of Title 18, United States Code, Chapter 110;



b. any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; and

c. any property, real or personal, used or intended to be used to commit or to promote the commission of such offense or any property traceable to such property.

**Property Subject to Forfeiture**

4. The property to be forfeited includes, but is not limited to, the following:

- a. Apple iPhone XR, model : A1984, s/n: DX3ZNDDCKXKP; and
- b. Homemade black computer tower #J21012513002, containing a Kingston SATA hard drive, 960GB, s/n: 50026B768381B312.

**Substitute Assets**

5. If the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be subdivided without difficulty;

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C.


§ 853(p), as incorporated by 18 U.S.C. § 2253(b) and 28 U.S.C. § 2461(c).

18 U.S.C. § 2253

18 U.S.C. § 2428

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

  
Erek L. Barron  
United States Attorney

**SIGNATURE REDACTED**

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Foreperson

Date: May 17, 2023